

Global Force Entertainment, Inc. and Jeffrey Jarrett,  
Plaintiffs,  
v.  
Anthem Wrestling Exhibitions, LLC,  
Defendant.

COMES NOW Defendant Anthem Wrestling Exhibitions, LLC (“Defendant” or “Anthem Wrestling”), by and through undersigned counsel, pursuant to Rule 104(a) of the Federal Rules of Evidence, and respectfully moves the Court *in limine*, with its Memorandum of Law in Support incorporated below, for entry of an Order excluding all evidence and discussion of non-party Anthem Sports & Entertainment Corp.’s (“Anthem Sports”) corporate structure and financial condition. Any such evidence of non-party Anthem Sports is irrelevant, prejudicial, and a waste of time. Pursuant to Local Rule 7.01(a)(1), Anthem Wrestling has conferred with Plaintiffs’ counsel and the relief sought by this Motion is opposed.

Case 3:18-cv-00749 Document 158 Filed 06/05/20 Page 1 of 4 PageID #: 2320

evidence of net worth of “defendants’ parent company and non-party to this suit”); *Spellbound Dev. Grp. Inc. v. Pacific Handy Cutter Inc.*, 2012 WL 8748801, at \*3 (C.D. Cal. Feb. 24, 2012) (granting defendants’ motion in limine to exclude as irrelevant evidence about parent company’s “assets or size”); *Greenwell v. Raytheon Aerospace Co.*, 1996 WL 476605, at \*1 (E.D. La. Aug. 22, 1996) (granting defendant’s motion in limine to exclude as irrelevant evidence about parent company’s “net worth”).

Anthem Sports was a defendant to this action but was dismissed with prejudice for lack of personal jurisdiction. (Order Granting Mot. to Dismiss for Lack of Personal Jurisdiction, Dkt. No. 80) This Court, in analyzing the jurisdictional issues, has already considered and rejected Plaintiffs’ argument that Anthem Sports and Anthem Wrestling were alter egos (Mem. Opinion, Dkt. No. 79, p. 9-12) and there has been no evidence of fraud in this matter. Therefore, any evidence of Anthem Sports’ corporate structure or financial condition is completely irrelevant to the action at hand. It has no impact on or relevance to any of Plaintiffs’ substantive claims. Additionally, such evidence of Anthem Sports’ financials or assets would be extremely prejudicial to Anthem Wrestling. While Anthem Sports is Anthem Wrestling’s parent entity, the two are completely separate business entities that do not share assets. Any evidence of Anthem Sports’ financials could prejudice the jury against Anthem Wrestling by leading them to believe that Anthem Wrestling has assets that it does not have and would not be able to use to pay any potential award to Plaintiffs. Finally, any such evidence would confuse a jury and waste time. The details of the relationship between Anthem Wrestling and its non-party parent and the parent’s financial condition are neither relevant nor helpful to the jury’s analysis of the substantive issues. Complicated financial and structural evidence will serve only to confuse the jury unnecessarily and waste time during trial.

## **CONCLUSION**

Anthem Wrestling humbly requests that the Court enter an Order excluding all evidence of Anthem Sports' financial condition and corporate structure because such evidence is irrelevant and prejudicial to Anthem Sports.

Respectfully Submitted,

**BASS, BERRY & SIMS PLC**

/s/ Paige W. Mills

Paige W. Mills, TN Bar No. 16218  
Ashleigh D. Karnell, TN Bar No. 36074  
150 Third Avenue South, Suite 2800  
Nashville, TN 37201  
Phone: (615) 742-6200  
Email: pmills@bassberry.com  
*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 5, 2020, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following and/or served the following via U.S. Mail:

Samuel F. Miller  
Sara R. Ellis  
Hayley Hanna Baker  
Miller Legal Partners, PLLC  
Fifth Third Center – Suite 2000  
424 Church Street  
Nashville, TN 37219

/s/ Paige W. Mills